

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X Case No. 1:20-cv-04457 (RA)(RWL)

ORLANDO MINO HERNANDEZ, OSMEL
RUBEN SOSA NAJERA, RAFAEL BASURTO
GOMEZ, JOSE LUIS MENDEZ, MIGUEL
MIRANDA, ROSALIO PEREZ, ANGEL
GEOVANI RAMOS, and PALEMEN BENITO
ANTONIO, Individually and on behalf of others
similarly situated,

Plaintiffs,

-against-

LIRA OF NEW YORK INC (D/B/A LUKE'S
BAR & GRILL), LUIGI MILITELO, TOMMY
TIN, JONATHAN MATEOS, and LUIGI LUSARDI

Defendants.

-----X

**DEFENDANT LUIGI LUSARDI'S INITIAL DISCLOSURES
PURSUANT TO FRCP 26(a)(1)**

Pursuant to Rule 26(a) (1) of the Federal Rules of Civil Procedure, Defendant LUIGI LUSARDI, (hereinafter referred to as "Defendant"), hereby submit his Initial Disclosures. In providing these disclosures, Defendant does not waive any objections that may be made regarding the production, use, or admissibility of the materials identified. To the extent further information relevant to these disclosures is obtained, Defendant will promptly provide the information to Plaintiff.

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of information.

- I. Knowledge regarding allegations in Complaint and the defenses contained in the Answer; All Plaintiffs and all Defendants in this action;
- II. Knowledge regarding allegations in Complaint and the defenses contained in the Answer; Gary Jackalow, 107 Brewery Road, New City, NY 10956; (845) 215-0775

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Annexed are documents bates stamped as D000001.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection any copying, as under Rule 34, the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of the injuries suffered:

Not Applicable.

D. For inspection and copying, under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

No such insurance agreement exists.

Dated: April 14, 2022
New York, New York

Respectfully Submitted,
MARK B. STUMER & ASSOCIATES, P.C.



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New York, New York 10001
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Fax (212) 691-3642
Attorney for Defendant – Luigi Lusardi

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PURSUANT TO FRCP 26(a)(1)**

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Attorney for Defendant – Luigi Lusardi



ANDREW M. CUOMO
GOVERNOR

STATE OF NEW YORK
EXECUTIVE DEPARTMENT
DIVISION OF ALCOHOLIC BEVERAGE CONTROL
STATE LIQUOR AUTHORITY
317 LENOX AVENUE, 5TH FLOOR
NEW YORK, NEW YORK 10027-4450
www.sla.ny.gov

DENNIS ROSEN
CHAIRMAN

JEANIQUE GREENE
COMMISSIONER

KEVIN KIM
COMMISSIONER

LIRA OF NEW YORK INC
LUKE'S BAR & GRILL
1394 3RD AVENUE
NEW YORK, NY 10075
Serial #: 1026687

Date: 07/21/2014
Corp. Change #: X01

NOTICE OF APPROVAL OF CORPORATE CHANGE

The following changes requested in your application for Corporate Change have been **APPROVED**.

<u>NAME</u>	<u>OFFICE</u>	<u>SHARES</u>
LUIGI MILITELLO	PRESIDENT/SECRETARY/DIRECTOR	100% 100

"No further transfer or re-transfer of the stock may be made to any person, including the seller,... nor can any change of officers or directors be effectuated without first complying with Section 99-d, Subdivision 2, of the Alcoholic Beverage Control Law and first obtaining the approval of the State Liquor Authority to such further transfer or re-transfer."

If the said corporate change, as approved herein, is not consummated, the Authority must be notified within ten days from the date of this notice by registered letter addressed to the State Liquor Authority, Licensing Section, at the zone office indicated above.

FRANCIS R BUSCEMI

STATE LIQUOR AUTHORITY

A handwritten signature in black ink, appearing to read "Kerri J. O'Brien", written over the printed text "STATE LIQUOR AUTHORITY".

Kerri J. O'Brien, Deputy Commissioner